

SEAN JEFFREY THOMPSON

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Plaintiff,

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v.

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Civil Action No.: **WDQ 1:02-CV-1989**

DETECTIVE STEPHEN MARTIN, et al.

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Defendants.

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NOTICE OF DISCOVERY FILING

The Defendant, Baltimore Police Department notes the filing of discovery of the following material in the above-captioned case:

1. Defendant's Responses to Interrogatories filed on January 30, 2004.
2. Defendant's Responses to Request for Production of Documents filed on January 30, 2004, consisting of the incident report, evidence control documents and other documents relating to that incident report, copies of three traffic citations issued to the plaintiff on March 29, 2002, General Orders governing the conduct of officers identified as C-2, C-8, C-9, C-10, D-3, G-3, G-10, J-3, J-8, J-12, K-5, K-6, k-14 and K-15, the booking photograph of the plaintiff, the curriculum vitae of the Defendant's expert witness, the roster or roll book for the Southwest District for the dates of March 28 & March 29, 2002, the statement of charges completed for the plaintiff's arrest of March 29, 2002, photographs of the scene and victim of the attempted murder incident for which the plaintiff was arrested, copies of the Baltimore City Code §§ 10-13 regarding the insurance program of Baltimore City and a letter from the Office of Risk Management for Baltimore City describing the nature of the insurance program for the City.

3. Supplemental Response to the Request for Production of Documents filed on February 13, 2004 consisting of defense training techniques instituted January 1, 2004, a summary of defense and arrest tactics training for Det. Steve Martin, Det. Michelle McCloskey and Off. Mark Kahler, and lesson plans for 1996, 1997, & 2001 Koga training and 2003 Hicks training, the Department's Education and Training Law Reference Guide for instruction of law effective October 1, 2002, and the Department's Education and Training Law Reference Guide for instruction of law effective prior to October 1, 2002, the Hicks Arrest and Control Techniques Training Manual and Student Handbook, and larger and cleared copies of the duty roster or roll book pages for the dates of March 28 and March 29, 2002 from the Southwest District, and affidavit of Lt. Paul Abell regarding the interrogatory responses from the Department.
4. Clarification of discovery issues discussed by telephone conversation on March 31, 2004 between Plaintiff's counsel and Defendant's counsel regarding video camera presence in patrol vehicles, discussion regarding depositions for officers for the first week in April, 2004, rescheduling of the depositions for April 21 and 22, 2004 for the officers and the Plaintiff, and a discussion regarding the confidentiality of personnel files of the officers and agreement that a joint stipulation order would suffice for preserving confidentiality of the personnel files, and a proffer that the material sought by counsel did not exist, but that counsel would be free to examine the personnel files to verify that fact, all memorialized in a letter dated April 14, 2004.

5. Defendant's, Baltimore Police Department's, Interrogatories and Request for Production of Documents to the Plaintiff delivered on March 10, 2004.

A handwritten signature in black ink, appearing to read "Peter Saar", with a horizontal line underneath.

Peter Saar, Fed. Bar. No. 26666
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